

EXHIBIT D

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Via E-mail

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Re: *In re Valsartan Products Liability Litigation*, MDL No. 2875 (RBK/JS)

Dear Counsel:

I write on behalf of Defendants Torrent Pharmaceuticals, Ltd. and Torrent Pharma, Inc. (collectively, “Torrent”) in response to Plaintiffs’ letter dated August 17, 2020 regarding alleged deficiencies in Defendants’ productions. Plaintiffs have raised three alleged “deficiencies” with regard to Torrent: (1) privilege logs, (2) production indexes, and (3) testing documents. Torrent will address each issue in turn.

First, with respect to privilege logs, Torrent’s July 15, 2020 production did not contain any documents that were redacted or withheld on the basis of privilege. Torrent will provide privilege logs as needed. With respect to a redaction log, Torrent does not intend to redact anything other than privileged information, and in extremely rare instances, sensitive personal information such as social security numbers and credit card numbers, which will be clear on the face of the document.

Second, with respect to the request for additional information in the “Source(s)” column of the production indexes, Torrent will provide additional information pursuant to the agreement reached between Joe Ferretti of Duane Morris on behalf of Defendants, and Behram Parekh on behalf of Plaintiffs.

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Third, with respect to Plaintiffs' request for testing documents, Torrent believes this request is premature. As conveyed to Plaintiffs' during initial discussions regarding the prioritization of certain categories of documents, many of Torrent's testing records are located in India and have not been collected due to COVID-19 shutdowns. Torrent has prioritized the review of documents hitting on testing search terms in its possession and remains committed to prioritizing other categories of documents requested by Plaintiffs.

Sincerely,

/s/ Alexia R. Brancato

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